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Attorneys for Plaintiff Pacific Information Resources, Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

Pacific Information Resources, Inc., a  
 California Corporation,

Plaintiff,

vs.

SIMPLE COMMUNICATIONS, an Alabama  
 corporation; WILLIAM TRAVIS SULLIVAN,  
 individually, AND DOES 1 through 100,  
 inclusive, WHOSE IDENTITIES ARE  
 UNKNOWN,

Defendants.

**CASE NO. CV-07-4131 MMC**

**[Before the Honorable Maxine M.  
 Chesney, Courtroom 7]**

**REQUEST FOR CONTINUANCE OF  
 CASE MANAGEMENT CONFERENCE**

Complaint Filed: August 9, 2007  
 Default Entered: October 2, 2007

Hearing Date: May 2, 2008  
 Hearing Time: 10:30 a.m.  
 Department: 7

Plaintiff Pacific Information Resources, Inc., (“Plaintiff” or “Pacific”) hereby humbly requests that the Court continue the Case Management Conference (“CMC”) currently scheduled for this Friday, May 2, 2008.

Plaintiff believes that there is good cause for this continuance for the following reasons:

1. Defendants Simple Communications (“Simple”) and William Travis Sullivan (“Sullivan”) (collectively “Simple Defendants”) are in default and still have not appeared or made any attempts to set aside the default;

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2. In light of the Court's denial of Pacific's Motion for Default Judgment without prejudice, Plaintiff is currently preparing a more limited Motion seeking relief that does not require adjudication of the related matter of *Pacific v Musselman*, Case No. C06-02306 MMC.

Therefore, Plaintiff Pacific respectfully requests that the CMC be continued for 60 days thereby allowing sufficient time for Pacific's narrower dispositive motion to be fully noticed, filed and heard, as well as provide sufficient time for the CMC to follow subsequently thereafter, if necessary.

Respectfully submitted,

DATED: April 29, 2008

**NOVO LAW GROUP, P.C.**

BY: /s/Konrad L. Trope, Esq.  
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INFORMATION RESOURCES,  
INC.

**PROPOSED ORDER**

Having reviewed the Request of Plaintiff Pacific for a continuance of 60 days of the Initial Case Management Conference in this matter; and good cause appearing therefore; it is hereby ordered that the Case Management Conference scheduled May 2, 2008 is hereby continued until July 11, 2008.

Dated:

Honorable MAXINE M. CHESNEY  
United States District Judge

**PROOF OF SERVICE**

I am employed in the County of Orange, State of California in the office of a member of the Bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is: **4631 Teller Avenue, Suite 140, Newport Beach, California 92660.**

On **April 29, 2008**, I served the foregoing document described as:

**REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE**

on the interested parties in this action by placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

***SEE ATTACHED SERVICE LIST***

**XX BY MAIL:** I deposited such envelope in the mail at Irvine, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

**BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the addressee at the address on the attached Mailing List.

**BY FEDEX:** I deposited such envelopes at Irvine, California for collection and delivery by Federal Express with delivery fees paid or provided for in accordance with ordinary business practices. I am "readily familiar" with the firm's practice of collection and processing packages for overnight delivery by Federal Express. They are deposited with a facility regularly maintained by Federal Express for receipt on the same day in the ordinary course of business.

**BY FACSIMILE:** I transmitted the foregoing document by facsimile to the party(s) identified above by using the facsimile number(s) indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL:** I transmitted the foregoing document by e-mail to the party(s) identified above by using the Internet Protocol Addresses indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL WITH CLERK OF THE COURT:** I certify that on 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing as indicated on the attached Mailing List.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **April 29, 2008** at Irvine, California.

/s/  
J. Renée Nordyke

***SERVICE LIST:***

*Pacific Information Resources v Simple Communications, et. al.*  
Case No. C-07-4131 MMC

**VIA U.S. MAIL**

William Travis Sullivan  
4931 Mason Road  
Clayton, Washington 99110

Simple Communications  
4931 Mason Road  
Clayton, Washington 99110

Simple Communications  
701 22nd Avenue  
Tuscaloosa, Alabama 35401